

8.d Periods when the flare is not operated as designed; and

Tradebe Response: Tradebe is providing a narrative for flare operation. Information for this question is also provided in other responses to EPA questions (8.e and 9d). Tradebe manually logged the presence of the flame in accordance with the site's Title V operating permit on page 1 of the SDS Carbon adsorption form as well as on operator process logs. The Manual carbon log monitoring is in a PDF format; copies of these Carbon Monitoring pages are provided for question 9d.

The SDS units are operated when the flare is working properly. A process shutdown occurs under circumstances where process parameters, monitored during operations, start to shift as a potential indication of an issue. The process shut down is done to ensure proper operation of the flare system. A process shutdown is where material is not fed into the SDS system. With the process feed restricted, non-condensable gases to the flare are reduced. The SDS emissions are then directed to the activated carbon units. The design of the carbon units take into account the residence time of the SDS units and residual VOCs are treated at the carbon units.

As previously stated, Tradebe is providing examples of the types of documents responsive to this question instead of copies of each document because of the volume.